

**FMC Corporation**

1735 Market Street  
Philadelphia Pennsylvania 19103  
215 299 6000



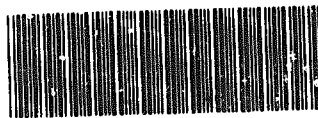
8EHQ-95-13549  
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**FMC**

November 22, 1995



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**8EHQ-1175-13549**

ATTN: TSCA 8(e) Coordinator

Dear Sir or Madam:

**Re: No CBI**

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This notification is submitted on behalf of FMC Corporation ("FMC"), 1735 Market Street, Philadelphia, PA 19103, pursuant to Section 8(e) of the Toxic Substances Control Act, Public Law 94-469 ("TSCA") and the Statement of Interpretation and Enforcement Policy, 43 FR 11110-11116, March 16, 1978 (the "Policy Statement").

FMC has just received preliminary, unaudited results from a 1-Generation Reproduction Study in rats conducted with Hydroxyphosphonoacetic acid, CAS Registry Number 23783-26-8.

Dose levels of 0, 1, 10, 50, 150 and 500 mg/kg/day for this reproduction study were selected based on a 90-day oral gavage study. In the 90-day study the dose levels were 0, 20, 110 and 600 mg/kg/day. There were 10 animals/sex/group. No females died during the course of the study. Among the males, 1/10 at 20 mg/kg and 3/10 at 600 mg/kg died.

In this oral gavage reproduction study rats are dosed for 10 weeks prior to mating. A summary of the mortality seen thus far:

<u>Dose Group (mg/kg/day)</u>	<u>0</u>	<u>1</u>	<u>10</u>	<u>50</u>	<u>150</u>	<u>500</u>
Number of males in study	24	24	24	24	24	24
Number males dead	0	0	0	0	0	4
Number females paired	24	24	24	24	24	23
Number females dead	0	0	0	0	3	11

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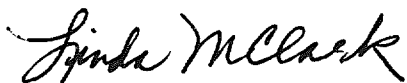
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Most of the pregnant dams died within a matter of days of parturition. Because this level of mortality in the females was unexpected based on the similar length of treatment and dose levels in the 90-day study, FMC is submitting this information to EPA pursuant to TSCA 8(e).

FMC is making no claims of confidentiality for this submission.

A complete copy of the audited final report will be submitted to the Agency once it becomes available.

Sincerely yours,



Linda M. Clark  
Supervisor, Product Regulatory Affairs  
215/299-6133

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